

Civil Suit Compliant

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1. Galadriel Herdman
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U.S. DISTRICT COURT
DISTRICT OF MASS.

Sonny Perdue
Former Secretary of Agriculture
1400 Independent Ave, SW
Washington, DC 20250

And

Tom Vilsack
Secretary of Agriculture
1400 Independent Ave, SW
Washington, DC 20250

2. Federal Question Case

3. From Late August/Early Sept 2012 to Jan 2013: Employment Disability Discrimination, Harassment, Hostile work Environment, Denied Reasonable Accommodations that applied to my disability. I have exhausted all possible resolution with the EEOC. Discrimination due to disability-supervisor reprimanded and punished me whenever I was not well, when my disability was affecting me. Discrimination started when I became ill/disabled and continued throughout employment until termination. Harassment-harsh treatment for normal work processes when all other employees didn't get treated harshly. Being singled out. Harrassed weekly. Denied reasonable accommodation-donation leave time, flex time to work later and on weekends, and telework. Instead of support, and accommodations, I received letters of counseling, reprimand, punishment. Letters of counseling were for normal work issues that a new employee would encounter and all issues were resolved weeks or months before letters of counseling were issued. One letter of counseling was for a computer training that allegedly wasn't finished, however, I came in while I wasn't well just to finish that training and it was complete. Previous to getting ill/disabled, I was winning awards at work, 3 in a month even. I was praised for my work. I have 13 years of school and went back for the last 3 years of education in order to qualify to work for the NRCS. I would not jeopardize my career. The treatment and termination were uncalled for and started when I became disabled.

4. a. Financial Restitution up to \$300,000:

Compensatory damages for financial costs, and emotional harm and suffering (including mental anguish, loss of enjoyment of life, some PTSD, stress).

Punitive damages for inappropriate disciplinary actions taken against me causing my name to be smeared within the federal government-difficulty in rehire within the federal government.

Financial collapse-Inability to pay bills; rent, utilities, food, credit cards that I was in good standing with. I am a Soil Scientist. 99% of Soil Scientists are employed by the federal government. Was not able to get rehired by the government with a disciplinary action taken against me.

b. Clearing of all disciplinary action taken against me from my time of employment with the NRCS.

c. No gag order in this case or anything pertaining to this case or my employment with the NRCS.

Galardiel Hardman 3-9-21